

FORD & HUFF LC
ATTORNEYS AT LAW

October 13, 2022

Hon. Ronnie Abrams
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Case Status Update
Stephen Gannon v. Hun Shing Corp., et al.
Case # 22-cv-1681

Dear Judge Abrams,

This letter is submitted by Adam Ford, counsel to Plaintiff.

Pursuant to the Case Management Plan and Scheduling Order entered by this Court on July 5, 2022 (docket no. 20), requests for production of documents, requests to admit and interrogatories were to be served by July 15, 2022 and depositions completed by October 10, 2022. Expert discover closes on December 16, 2022.

On July 15, 2022 Mr. Minsley sent an email to all counsel of record attached to which was a notice of Plaintiff's deposition and requests for the production of documents directed to Plaintiff. The deposition did not take place and Plaintiff has not responded to the document requests. Mr. Minsley made no further attempts to communicate with Plaintiff's counsel between the July 15 service and the present time regarding the deposition or document requests and has made no attempts to meet and confer with Plaintiff's counsel regarding discovery in general.

On the morning of July 15, 2022 Mr. Ford was in a very serious car accident. He was rear-ended while stopped at a stop light by a Ford F-150 truck traveling approximately 40 miles per hour. In addition to extensive damage to his right knee which necessitated surgery, Mr.

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Ford suffered a severe concussion, made worse as it reagravated the head injury which resulted in his service-related medical discharge from the U.S. Army two decades ago. The road to recovery has been slow and painful, but is coming along.

Mr. Ford apologizes to Mr. Minsley and this Court for not responding to discovery, including providing no communication regarding the deposition of the Plaintiff.

The parties ask that all dates in the Scheduling Order be pushed back 90 days to allow the parties to complete discovery and, if the matter is not settled, prepare for trial.

We thank the court for its attention in this matter.

Respectfully Submitted,

/s/ Adam Ford

Adam Ford

Ford & Huff LC

cc: All Counsel of Record (via ECF)